

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143  
The Honorable Judge Ellis

Pretrial conference: May 7, 2021  
Trial: July 12, 2021

**MOTION TO SEAL DEFENDANT'S REPLY TO GOVERNMENT'S OPPOSITION TO  
DEFENDANT'S MOTION TO FILE REDACTED VERSIONS  
OF TRANSCRIPTS AND EXHIBITS ON THE PUBLIC RECORD**

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting portions of his Reply and the entirety of exhibits thereto to be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

ZACKARY ELLIS SANDERS  
By Counsel

Respectfully submitted,

/s/

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*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify on this 5th day of May 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record.

/s/ Jonathan Jeffress  
Jonathan Jeffress